## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

PRINCIPLE SOLUTIONS GROUP,	)
LLC,	)
	)
Plaintiff,	)
	) CIVIL ACTION FILE
V.	) NO. 1:15-cv-04130-RWS
	)
IRONSHORE INDEMNITY, INC.,	)
	) JURY TRIAL DEMANDED
Defendant.	)

## PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON ITS BREACH OF CONTRACT CLAIM

Plaintiff Principle Solutions Group, LLC ("Principle") respectfully moves for summary judgment on its claim for breach of an insurance contract against Defendant Ironshore Indemnity, Inc. ("Ironshore"). Principle fell victim to a sophisticated computer and funds transfer fraud and lost \$1.717 million. Ironshore determined that the "Computer and Funds Fraud Coverage" in the crime insurance policy it sold to Principle could not be read to provide coverage. Principle is entitled to summary judgment on its breach of contract claim because its loss falls squarely within the coverage grant and Ironshore's strict interpretation of the "resulting directly" requirement for losses conflicts with Georgia and other states'

insurance law, goes against banking regulations, and results in improper illusory coverage.

Plaintiff files contemporaneously herewith and incorporates herein its Brief in Support and Local Rule 56.1(B)(1) Statement of Material Facts.

Respectfully submitted this 13<sup>th</sup> day of January, 2016.

s/ James J. Leonard

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 13<sup>th</sup> day of January, 2016, I electronically filed the foregoing Motion for Partial Summary Judgment by using the CM/ECF system, which automatically sends notification of such filing to the following attorneys of record:

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